

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

CONSTANCE ALEXANDER and  
PETULA ALEXANDER and DINORAH  
WILLIAMS,

Plaintiffs,

v.

STEADFAST INSURANCE COMPANY  
(STEADFAST), CLARENDON  
AMERICAN INSURANCE COMPANY  
(CLARENDON), DEEP SOUTH  
SURPLUS OF TEXAS, L.P., and CRC  
SCU f/k/a CRUMP INS. SERVICES,

Defendants.

1:20-CV-38

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**NOTICE OF SERVICE OF PLAINTIFF DINORAH WILLIAMS' FIRST  
DEMAND FOR PRODUCTION TO DEFENDANT STEADFAST INSURANCE  
COMPANY**

**PLEASE TAKE NOTICE** that Plaintiff **DINORAH WILLIAMS'** has propounded her First Demand for Production of Documents to Defendant **STEADFAST INSURANCE COMPANY** through respective counsel of record, and that said documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiffs

DATED: August 18, 2023

BY: /s/ Jennifer S. Koockogey-Lajoie  
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ALEXANDER, CONSTANCE, ET. AL. V. STEADFAST INSURANCE COMPANY, ET. AL.  
CASE NO. 1:20-CV-38, DINORAH WILLIAMS' FIRST REQUEST FOR PRODCUTION TO DEFENDANT STEADFAST  
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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on August 18, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

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BY: /s/ Jennifer S. Koockogey-Lajoie (al)